

1 KENT M. ROGER, State Bar No. 95987
HERMAN J. HOYING, State Bar No. 257495
2 MINNA L. NARANJO, State Bar No. 259005
MORGAN, LEWIS & BOCKIUS, LLP
3 One Market, Spear Street Tower
San Francisco, CA 94105-1126
4 Telephone: 415.442.1000
Facsimile: 415.442.1001
5 kroger@morganlewis.com
hhoying@morganlewis.com
6 mnaranjo@morganlewis.com

7 Attorneys for Defendants
HITACHI, LTD., HITACHI DISPLAYS, LTD.,
8 HITACHI ELECTRONIC DEVICES (USA), INC.

9 **[Additional defendants and counsel
listed on signature pages]**

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 ALFRED H. SIEGEL, AS TRUSTEE OF THE
15 CIRCUIT CITY STORES, INC.
LIQUIDATING TRUST,

16 Plaintiff,

17 vs.

18 AU OPTRONICS CORPORATION, *et al.*,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. 10-cv-5625 SI

Master File No. 3:07-md-1827 SI

MDL No. 1827 SI

**STIPULATION OF EXTENSION OF
TIME TO ANSWER SECOND
AMENDED COMPLAINT AND
[PROPOSED] ORDER**

The Honorable Susan Illston

1 WHEREAS plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc.
 2 Liquidating Trust ("Circuit City"), filed a Second Amended Complaint in the above-captioned
 3 case against Defendants AU Optronics Corporation, AU Optronics Corporation America, Inc.,
 4 Chi Mei Corporation, ChiMei Innolux Corporation, Chi Mei Optoelectronics USA, Inc., CMO
 5 Japan Co., Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA, Inc., Chunghwa Picture Tubes
 6 Ltd., Tatung Company of America, Inc., Epson Imaging Devices Corporation, Epson Electronics
 7 America, Inc., HannStar Display Corporation, LG Display Co. Ltd., LG Displays America, Inc.,
 8 Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America,
 9 Inc., Sharp Corporation, Sharp Electronics Corporation, Toshiba Corporation, Toshiba America
 10 Electronic Components, Inc., Toshiba America Information Systems, Inc., Toshiba Mobile
 11 Display Co., Ltd., Hitachi Displays, Ltd., Hitachi Electronic Devices (USA), Inc., and Hitachi,
 12 Ltd. (collectively, "Stipulating Defendants"), on July 7, 2011;

13 WHEREAS the Court denied Stipulating Defendants' motion to dismiss the Second
 14 Amended Complaint on September 15, 2011;

15 WHEREAS the Stipulating Defendants' deadline to respond to the Second Amended
 16 Complaint currently is September 29, 2011;

17 WHEREAS extending the Stipulating Defendants' time to respond to the Second
 18 Amended Complaint will not alter the date of any other event or deadline already fixed by the
 19 Court;

20 THEREFORE, Circuit City and the Stipulating Defendants hereby agree:

21 1. The Stipulating Defendants' deadline to answer to the Second Amended
 22 Complaint shall be October 17, 2011.

1 Dated: September 21, 2011

SUSMAN GODFREY LLP

2
3 By /s/ Kenneth S. Marks
4 Kenneth S. Marks

5 Kenneth S. Marks (*pro hac vice*)
6 H. Lee Godfrey (*pro hac vice*)
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096
7 Tel: (713) 651-9366
8 Fax: (713) 654-6666
kmarks@susmangodfrey.com
lgodfrey@susmangodfrey.com

9
10 David H. Orozco (State Bar No. 220732)
1901 Avenue of the Stars, Suite 950
Los Angeles, California 90067-6029
11 Tel: (310) 789-3100
12 Fax: (310) 789-3150

13 Attorneys for Plaintiff
ALFRED H. SIEGEL, AS TRUSTEE OF THE
14 CIRCUIT CITY STORES, INC.
LIQUIDATING TRUST

15 MORGAN, LEWIS & BOCKIUS LLP

16
17 By /s/ Kent M. Roger
18 Kent M. Roger

19 Kent M. Roger (Bar No. 95987)
Herman J. Hoying (Bar No. 257495)
20 Minna L. Naranjo (Bar No. 259005)
One Market, Spear Street Tower
San Francisco, CA 94105-1126
21 Tel: (415) 442-1000
22 Fax: (415) 442-1001
kroger@morganlewis.com
hhoying@morganlewis.com
mnaranjo@morganlewis.com

23
24 Attorneys for Defendants
25 HITACHI, LTD., HITACHI DISPLAYS,
LTD. and HITACHI ELECTRONIC DEVICES
26 (USA), INC.

DAVIS POLK & WARDWELL LLP

By: s/Christopher B. Hockett
Christopher B. Hockett

Christopher B. Hockett (Bar No. 121539)
Neal A. Potischman (Bar No. 254862)
Sandra West (Bar No. 250389)
Samantha H. Knox (Bar No. 254427)
Micah G. Block (Bar No. 270712)
1600 El Camino Real
Menlo Park, California 94025
(650) 752-2000 / (650) 752-2111
chris.hockett@davispolk.com
neal.potischman@davispolk.com
sandra.west@davispolk.com
samantha.knox@davispolk.com
micah.block@davispolk.com

Jonathan D. Martin (admitted *pro hac vice*)
Bradley R. Hansen (admitted *pro hac vice*)
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, NY 10017
(212) 450-4000 / (212) 701-5800
jonathan.martin@davispolk.com
bradley.hansen@davispolk.com

Attorneys for Defendants CHI MEI
CORPORATION, CHIMEI INNOLUX
CORPORATION; CHI MEI OPTOELECTRONICS
USA, INC., CMO JAPAN CO., LTD., NEXGEN
MEDIATECH, INC., and NEXGEN MEDIATECH
USA, INC.

GIBSON, DUNN & CRUTCHER LLP

By: s/Rachel S. Brass
Rachel S. Brass

Rachel S. Brass (Bar No. 219301)
555 Mission Street
San Francisco, CA 94105-2933
Tel: (415) 393-8200
Fax: (415) 393-8306

Attorneys for Defendants
CHUNGHWA PICTURE TUBES, LTD. and
TATUNG COMPANY OF AMERICA, INC.

MORRISON & FOERSTER LLP

By: s/Stephen P. Freccero
Stephen P. Freccero

Melvin R. Goldman (Bar No. 34097))
Stephen P. Freccero (Bar No. 131093)
Derek F. Foran (Bar No. 224569)
425 Market Street
San Francisco, CA 94105-2482
Tel: (415) 268-7000
Fax: (415) 268-7522

Attorneys for Defendants
EPSON IMAGING DEVICES CORPORATION
and EPSON ELECTRONICS AMERICA, INC.

1 K&L GATES LLP

2
3 By: s/ Ramona M. Emerson
4 Ramona M. Emerson

5 Hugh F. Bangasser, (admitted *pro hac vice*)
6 Ramona M. Emerson, (admitted *pro hac vice*)
7 Christopher M. Wyant, (admitted *pro hac vice*)
8 925 Fourth Avenue, Suite 290
9 Seattle, WA 98104
10 Tel: (206) 623-7580
11 Fax: (206) 623-7022

12 Jeffrey L. Bornstein (Bar No. 99358)
13 Four Embarcadero Center, Suite 1200
14 San Francisco, CA 94111
15 Tel: (415) 249-1059
16 Fax: (415) 882-8220

17 Attorneys for Defendants
18 HANNSTAR DISPLAY CORPORATION

19 NOSSAMAN LLP

20 By: s/ Christopher A. Nedeau
21 Christopher A. Nedeau

22 Christopher A. Nedeau (Bar No. 81297)
23 Patrick J. Richard (Bar No. 131046)
24 Katharine Chao (Bar No. 247571)
25 50 California Street, 34th Floor
26 San Francisco, CA 94111
27 Tel: (415) 398-3600
28 Fax: (415) 398-2438

Attorneys for Defendants
AU OPTRONICS CORPORATION, and AU
OPTRONICS CORPORATION AMERICA

CLEARY GOTTlieb STEEN & HAMILTON
LLP

By: s/Michael R. Lazerwitz
Michael R. Lazerwitz

Michael R. Lazerwitz (admitted *pro hac vice*)
Jeremy J. Calsyn (State Bar No. 205062)
Lee F. Berger (State Bar No. 222756)
One Liberty Plaza
New York, NY 10006
Tel: (212) 225-2000
Fax: (212) 225-3999
mlazerwitz@cgsh.com

Attorneys for Defendants
LG DISPLAY CO., LTD., and LG DISPLAY
AMERICA, INC.

COVINGTON & BURLING LLP

By: s/ Robert D. Wick
Robert D. Wick

Robert D. Wick (admitted *pro hac vice*)
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Tel: (202) 662-6000
Fax: (202) 662-6291

Attorneys for Defendants
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG ELECTRONICS CO., LTD.

PILLSBURY WINTHROP SHAW PITTMAN LLP

By s/John M. Grenfell
John M. Grenfell

John M. Grenfell (Bar No. 88500)
50 Fremont Street
San Francisco, CA 94105
Tel: (415) 983-1000
Fax: (415) 983-1200

Attorneys for Defendants
SHARP CORPORATION AND SHARP
ELECTRONICS CORPORATION

WHITE & CASE LLP

By: s/John H. Chung
John H. Chung

John H. Chung (admitted *pro hac vice*)
1155 Avenue of the Americas
New York, NY 10036
Tel: (212) 819-8200
Fax: (212) 354-8113

Christopher M. Curran (admitted *pro hac vice*)
Kristen J. McAhren (admitted *pro hac vice*)
701 13th Street, NW
Washington DC 20005
Tel: (202) 626-3600
Fax: (202) 639-9355

Attorneys for Defendants
TOSHIBA CORPORATION, TOSHIBA MOBILE
DISPLAY TECHNOLOGY CO., LTD., TOSHIBA
AMERICA INFORMATION SYSTEMS, INC.,
TOSHIBA AMERICA ELECTRONIC
COMPONENTS, INC.

FILER'S ATTESTATION

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that the concurrence of the signatories thereto has been obtained.

/s/ Kent M. Roger


Kent M. Roger

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc.

[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil
Local Rules, IT IS SO ORDERED.

Dated: September 21, 2011

By 
HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE